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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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Carol W. Newkirk

Case No.: 10-15261

Debtor.

In Proceeding for
Reorganization Under
Chapter 11

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**NOTICE OF MOTION OF THE DEBTOR'S COUNSEL FOR SUBSTITUTION OF
COUNSEL ON CONSENT OF DEBTOR**

PLEASE TAKE NOTICE, that, upon the Motion of the Debtor for an Order authorizing Debtor's Counsel to be substituted on consent (the "Motion") dated January, 27 2011, the Debtor will move at a hearing to be held before the Hon. Burton R. Lifland at the United States Bankruptcy Court, SDNY, Alexander Hamilton Customs House, One Bowling Green, New York, NY 10004 on February 9, 2011 at 10:00 a.m. of said day, or as soon thereafter as counsel can be heard for an Order permitting Debtor's Counsel to be substituted on consent.

PLEASE TAKE FURTHER NOTICE that responsive papers, if any, shall be filed with the Court in compliance with the Court's electronic filing system and served upon Tanya P. Dwyer, Esq. at Dwyer & Associates LLC, 11 Broadway, Suite 615, New York, NY, 10004; Office of the United States Trustee, Southern District of New York, 33 Whitehall Street, 21st.

Floor, New York, NY 10004; with a courtesy copy delivered to the Hon. Burton R. Lifland so as to be received no later than the date and time of the hearing.

Dated: January 27, 2011

New York, New York

Respectfully submitted,

/s/ Tanya P. Dwyer

Tanya P. Dwyer (TD 2845)

DWYER & ASSOCIATES LLC

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